B&V WASTE SCIENCE AND TECHNOLOGY CORP.
A Black & Veatch Company
101 North Wacker Drive, Suite 1100, Chicago, Illinois 60606, (312) 346-3775, Fax (312) 346-4781

USEPA/ARCS V
Expanded Site Inspections (Group 2) 33-5JZZ

BVWST Project 71280.020
BVWST File C.3
March 30, 1994

File: 71280.127
C.3

Mr. Alan Altur
U.S. Environmental Protection Agency
77 West Jackson Boulevard (HSM-5J)
Chicago, Illinois 60604

Subject: Strategy Meeting (Rhodes Landfill, United Recovery Site, and Bill's Excavating Site)

Dear Mr. Altur:

This letter documents the teleconference held on Friday, March 25, between Mr. Alan Altur, the U.S. Environmental Protection Agency project Work Assignment Manager (WAM), and six B&V Waste Science and Technology Corp. (BVWST) representatives. The preliminary PREscore results for the three subject sites were discussed along with issues related to other Expanded Site Inspection (ESI) Group 2 sites. The BVWST representatives who participated were Scott Anderson, Steve Mrkvicka, Margaret Casserly, Greg LaVerghetta, Oliver Graf, and Wade Gregson.

Rhodes Landfill

(1) Site Description and Preliminary PREscore Values

Margaret Casserly presented the site description, the background information on hazardous waste activities onsite, and the preliminary PREscore results. The inactive site, owned by Mr. Charles Rhodes, is approximately 16 acres and is located west of Decatur, in Macon County, Illinois. The site is in the 10 year floodplain of the Sangamon River, which borders the landfill on the south. Lake Torkorozawa, a flooded gravel quarry, borders the landfill on the west.

The Rhodes site evolved from an open dump in the 1940s, operated as a landfill and was closed in 1992. The landfill was permitted to accept construction/demolition wastes and special waste such as foundry sand. Repeat violations were noted during IEPA inspections, including acceptance of unpermitted waste, inadequate or inappropriate daily cover, and improper salvage activities. An SSI was conducted in 1990. Six soil and two sediment samples were collected. Benzo(j,k) fluorene, pyrene, benzo(k) fluoranthene, benzo(a) pyrene, and copper were detected. The organic compounds were present in the downgradient sediment sample but not in the upgradient sediment sample. Copper was found in the upgradient sample but was significantly higher in the downgradient sample.

These substances and others were found in the onsite soil samples. The overall preliminary site PREscore is 50.71.

(2) Summary of Four Pathways
The soil exposure pathway resulted in a score of 0.68. This low score is due to lack of onsite and neighboring targets. The surface water pathway scored 100.0. This score is the result of the observed release and recreational fishing in the Sangamon River. There are no surface water drinking targets within fifteen downstream miles of the site. The groundwater migration pathway scored 16.91. The groundwater populations are 77 persons within a quarter-mile radius of the site, approximately 900 people within one mile, and over 10,000 persons within four miles of the site. The resulting score is tempered by lack of actual groundwater analytical data, low drinking water populations within the closer distance rings from the site, and a low permeability natural clay/silt layer assumed to underlie the landfill. The air migration pathway scored 0.94 and is not of primary concern.

(3) Other Pertinent Discussion
Margaret mentioned that there are no known monitoring wells onsite. Installing groundwater monitoring wells may be of value in scoring this site. With groundwater data, there is enough groundwater drinking population within four miles of the site to generate a higher groundwater migration pathway score.

(4) Action Items
Alan agreed to move onto the reconnaissance phase for this site. Margaret will prepare an owner/operator notification package to be sent to the site owner.

United Recovery Site

(1) Site Description and Preliminary PREscore Values
Greg LaVerghetta presented information on the United Recovery site. The United Recovery site is located on approximately 4 acres on the north side of Rockton, Winnebago County, Illinois. The site consists of four corrugated metal buildings, two production wells, a septic tank, and a dry well. From 1979 to 1984, the facility reclaimed fine, high speed, steel cuttings that were contaminated with cooling oil. The raw material was washed and dried, producing a clean, dry steel powder. This steel powder was later used for resmelting. The removed oil was stored onsite in three above ground storage tanks and one underground storage tank. The remaining solid residue, called "wheel," was stockpiled on land for drying. The process water was treated before being

discharged to a septic tank and a dry well. Durirg operation, the site produced about 18,000 gallons per week of incustrial wastewater.

In 1981, IEPA directed the operator to install a six-inch curb around the site to contain oily runoff from discharging to neighboring property. Site runoff reportedly is directed to a storm drain but its destination is unknown. Runoff is likely to be discharged either to a treatment facility or to the Rock River which is less than a quarter mile to the west. As of 1989, the four buildings onsite were being used as a repair shop and storage for antique cars. There is a residential area immediately northeast of the site. The Beloit Corporation NPL site is located to the northwest of the United Recovery site. In 1988, IEPA discovered 17 contaminated wells in a subdivision across the street from Beloit Corp. IEPA believed the contamination is linked to questionable disposal practices by Beloit Corp.

Site activities at United Recovery have included waste piling, drum storage, illegal discharging of industrial wastewater to a septic tank and a dry well, and a 500 gallon oil spill that occured in the early 1980s. The facility was placed on CERCLIS after numerous complaints by local residents. Observations by residents included thick, smelly smoke, waste oil dumping, iridescent ponded water and oil leaking from onsite buildings. On June 19, 1989, six onsite soil samples were taken by Ecology and Environment (E&E). Sample results showed elevated levels of VOCs, semi-VOCs, and heavy metals. Five drinking wells were sampled on June 20, 1989, by E&E. The well samples also showed elevated levels of VOCs, semi-VOCs, and heavy metals. The overall site preliminary PREscore is 48.50.

(2) Summary of Four Pathways

The surface water pathway score was zero because of lack of data. The soil exposure pathway resulted in a score of 28.2. This score is due to an onsite release and residents living within 200 feet of the site. The groundwater migration pathway score is 92.80. This score is due to four residential wells adjacent to the site having elevated levels of 1,1,1-trichloroethane ard tetrachloroethene. The total population served by groundwater within a four-mile radius of the site exceeds 13,000. 6,000 of the targets are from private wells screened in the upper till aquifer. The air migration pathway scored 1.35 based on general population within four miles of the site. The air pathway is not a primary pathway of concern.

(3) Other Pertinent Discussion
There was discussion on the fact that more information is needed on the groundwater pathway in order to determine if residential well contamination is attributable to the United Recovery site or due to contamination from the upgradient Beloit Corp. NPL site. Alan agreed to contact the USEPA remedial site manager for the Beloit Corp. site. Alan thinks Mr. Charles Brasher is the remedial manager. Alan will inquire about groundwater characterization, groundwater data, and monitoring well installation and locations for the Beloit Corp. site.

(4) Action Items
BVWST is likely to perform a reconnaissance visit to the United Recovery site after the USEPA WAM determines the status of the Beloit Corp. NPL site.

Bill's Excavating Site

(1) Site Description and Preliminary PREscore Values
Oliver Graf presented information on the Bill's Excavating site. The site is approximately 59 acres and is located on Route 171 in southern Lockport, Will County, Illinois. The site is bordered on the west by the Des Plaines River/Chicago Ship and Sanitary Canal and on the east by the Illinois/Michigan Canal. These surface water bodies join south of the site. The site was used by U.S. Steel for a coking operation that was closed in the 1930s.

IEPA first investigated the facility in 1973 responding to complaints that extensive open dumping was occurring. T.P.G. Enterprises purchased the land from Iris Development in 1974. The files indicate that some clean-up and improvement work took place and by 1976, site conditions had improved considerably. In 1980, USEPA responded to a tip from the Cook County Metropolitan Sanitary District that there were abandoned drums on the property. Approximately 100 drums were found leaking resinous tar to the ground from an open trailer. Site reports indicate the existence of a 400 cubic foot tar pile covered with fill. Tar was seen to seep away from the pile because of localized heat effects from high temperatures during summer months. Other reports identified tar tanks filled with residual waste tar and sediment tanks covered with oil/tar residue in the basement of a washing and cooling building abandoned by U.S. Steel. In the fall of 1980, there was a report that an onsite worker alleged illegal chemical dumping had occurred at the facility. In 1981 IEPA found that most of the drums had been removed from the site but their disposal disposition was not documented.

A FIT site inspection was conducted on July 31, 1984. Another FIT inspection was conducted on July 16, 1985 and included sampling. FIT collected two samples near the open trailer, along the dripline to incorporate any material that may have leaked onto the ground. Two other samples were taken along the western edge of the property, one sample from a dried creek bed and the other from the tar pile. A sample from a drinking water well that served a mobile home onsite was also analyzed, but showed no signs of contamination. The results from the soil and waste pile sampling showed elevated levels of contaminants including approximately 20 different PAHs, VOCs, and inorganics. The highest contamination was found in the creek bed and the tar pile. The overall site preliminary PREscore is 37.68.

(2) Summary of Four Pathways
The soil exposure pathway scored 10.20. This score is due to high site accessibility, one worker assumed onsite, and documented release. The groundwater migration pathway scored 18.76. There is an onsite well and the drinking water population within four miles of the site exceeds 102,000. The surface water pathway scored 76.37 due to the assumption that site runoff is being discharged to the fisheries neighboring the site. The air migration pathway scored 3.27 and is not of primary concern.

(3) Other Pertinent Discussion
Alan agreed to contact USEPA emergency response and removal personnel to determine if there is any history of removal actions at this facility.

(4) Action Items
The WAM will check with removal personnel before we move into the reconnaissance stage.

Other Progress, Items of Interest, and Action Items

(1) Estwing Site
Alan and Steve briefly talked about an ESI-Group 1 site. Alan stated that he would prepare a memorandum explaining that the Estwing site was excluded from further evaluation because the owner is a PRP within the southeastern Rockford area.

(2) Sampling Location Maps
Alan requested sampling location maps for the southern Chicago CERCLIS sites sampled to date. He said that he has a request from the Illinois Water Survey Department for groundwater and surface water sampling conducted in the south Chicago area.

Sincerely,

B&V WASTE SCIENCE AND TECHNOLOGY CORP.

Wade A. Gregson

Wade Gregson

cc: S. Anderson
S. Mrkvicka
M. Casserly
G. LaVerghetta
O. Graf

LET12/ESI-2,Gen #3